

As a user of radio communications systems across the 1 to 50 MHz, I am deeply concerned about the interference that shall be generated by this technology. I have heard different vendor's technology in action and have found a tremendous interference that I consider harmful to my operation of communications equipment. This BPL communications system will make impossible the communications I have enjoyed for over 40 years. My deepest concern is the lack of solid test data collected in any scientific manner and made public. All pilot studies should make public the full impact of this technology without regard to disclosure of competitive details. The FCC should make public all details of any deployment with accompanying data that is uniform and respects the BPL equipment producers as well as the affected communications community. All indications of the interference that the general public has been exposed to has been deemed fundamentally bad for emergency, public safety, short wave broadcast reception and the amateur radio operators. All would be affected in a detrimental way. Increasing transmitter power to overcome the BPL signals from these services will be counter to the success of any BPL deployment, which would be one way to overcome this type of interference but will cause an escalating upward spiral of interference. Exception: when one tries to receive weak signals, any additional noise from a local broad frequency source will be harmful to this communications environment and no increase in transmitter power will overcome this noise level. Am also deeply concerned about the negative backlash to these existing radio services when they start to interfere with BPL and bandwidth degrades, and customer satisfaction drops. Since the BPL is susceptible to other systems operating in the same frequency bands there is high potential for accusatory pointing to the already approved communications systems as being a source of interference to BPL. Although there appears to be a great deal of market excitement from the Energy & Utilities market to add to their revenue stream and drive cost out of their internal operations, this technology will seriously injure the country's ability to provide quality radio communications during times of a national emergency or a terrorist event. As the Emergency Management Director of my community I depend on the reliable communications systems provided by the local amateur radio operators as often other systems have failed in emergency events, including telephone, power and other radio systems, I am again very troubled by the potential for degraded communications for the services I depend. I believe if FCC Part 15 is utilized to cover the BPL technology, it is not appropriate for a "broadband service" as it not a single frequency source. For a BPL vendor to indicate Part 15 compliance is not realistic as is it only applies to single frequency sources. BPL is a broadband source and should be treated much differently. It is my understanding that the FCC's fundamental directive is to protect all users of the spectrum and the application of Part 15 in this mismatched condition is not appropriate. Part 15 speaks to interference from single frequency sources and how protection needs to be considered by both parties. BPL is a technology that goes beyond the intent or scope of Part 15. Before preceeding with a full deployment of BPL, I am requesting a re-write of Part 15 to insure adequate protection to the existing radio communications systems in use today. The cost to change affected technology to accomodate Broadband over Power Lines would be prohibitive (if not impossible). I encourage the

FCC to discontinue all pilots and experimental licensing of this technology until adequate safeguards are in the place. Other technologies such as WiMax could be the best alternative here to meet the needs of the power company's desire to generate new revenue to offset the cost of electricity in this country. Consider the use of WiMax as a viable alternative both in terms of performance and cost to deploy. My last concern is how open the BPL network is for attacks and security breaches or virus attacks that could bring down the network. If utilities intend to also use this network for monitoring or controlling SCADA or other network devices, it would be subject to outside security attacks. Ethical hacking tests should be part of the compliance requirements. Please seriously consider this issue as well. The August 14 power outage apparently has been attributed to a failure in the SCADA system. Hacking or introducing a virus into such a system could cause considerable havoc and undue economic pressures to an already strained economy.